



# COMPRESSED GAS ASSOCIATION, INC.

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RSPA - 2001-12440-1 177644

March 16, 2001

Mr. Edward Mazzullo, Director  
Office of Hazardous Materials Standards  
U.S. Department of Transportation  
Research and Special Programs Administration  
400 7<sup>th</sup> Street SW  
Washington, DC 20590

Dear Mr. Mazzullo,

The Compressed Gas Association (CGA), founded in 1913, represents over one hundred and fifty member companies' world wide in the development and promotion of safety standards and safe practices in the industrial gas industry. The Association represents all facets of the industry – manufacturers, distributors, suppliers, and transporters. Through the committee system CGA creates technical specifications, safety standards, training and educational materials; and also works with government agencies to formulate responsible regulations and standards and to promote compliance with these regulations.

CGA members produce, market, and distribute industrial gases and cryogenic liquids such as acetylene, carbon dioxide, ethylene, hydrogen, nitrogen, nitrous oxide, and oxygen as well as various specialty gases, many classified as poison gases. Accordingly, our members have a strong interest in domestic and international regulations governing these products and the containers in which they are shipped.

CGA routinely reviews and, if necessary, revises publications every five years. As such, the Acetylene Committee of CGA has recently revised its standard on acetylene cylinder requalification (C-13 – 1992, *Guidelines for Periodic Visual Inspection and Requalification of Acetylene Cylinders*). C-13 – 1992 is currently referenced in 49 CFR in sections 171.7, 173.34 and 173.303.

The CGA respectfully requests that DOT reference the recently approved new edition of C-13 – 2000 in those sections. Enclosed are four copies of the revised standard along with four copies of the 1992 edition.

The standard has been reformatted according to CGA style and all significant changes and additions have been identified by underlined text. The specific section of C-13 noted in 173.34(e) has been changed from 5.6 to 8.6 and in 173.303(e) section 7 is now the appropriate reference for prefill inspection. Of the changes, CGA believes two should be specifically identified and rationale given.

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First, CGA is requesting that CGA C-13--2000 be included in the listing of publications in 173.34(e)(5)(i) and (iv)(A). Also include C-13 in the listing of publications in paragraph 173.34(e)(6)(i)(A) and (G)(ii). This will include acetylene cylinders in the rejection criteria and allow condemned acetylene cylinders to be permanently marked as such. This is an important issue for the acetylene industry and CGA has responded with a Safety Alert, SA-9--1999 – *Scrap B and MC Acetylene Cylinders Re-Entering the Market Place* to alert fillers of this problem. Four copies of SA-9 are included for your information. See section 8.6.2 of C-13.

It should be noted that this change was proposed in HM-220 with language incorporated in Section 180.205(f)(1) and following paragraphs (four copies attached).

The second major change relates to requalification of the porous mass. Paragraph 173.34(e)(18)(i) and note 2 of the chart, states the requalification of the porous mass must be performed no sooner than 3 years, but no later than 20 years, from the date of manufacture. The new version of C-13 has been changed to read "no sooner than 5 years" thus it is requested that DOT incorporate this change. The decision of the Acetylene Committee is that the 3-year time period is too short for defects related to cylinder handling to appear. Many cylinders are held at the manufacturer's location for periods of time before shipping to customer's and many new cylinders are held in stock at the customer's location for another period of time before placing them in service. Since the in service date could be much later than the date of manufacture for some cylinders, it is believed that the five years would be more adequate time for any defects caused by cylinder handling to appear. See paragraphs 3.1, 3.2 and Table 1 of C-13.

In closing, CGA would like to bring to the attention of DOT requalifications issues that the acetylene industry is facing. There have been incidents where cylinders have been offered for refill that 1) were apparently not requalified as per C-13 or 2) had been set aside to be scrapped and were illegally "reworked" and returned to service.

With the January 1, 2001 requalification deadline passed for cylinders manufactured prior to 1991, there is the potential for so called "rogue requalifiers", who have valid RIN's, to skip the requirements of C-13. CGA fully supports the January deadline as well as the continued DOT diligence on inspecting acetylene cylinder requalifiers. Please contact me with any questions you may have or for any assistance we can provide to achieve approval of our request.

Sincerely,

COMPRESSED GAS ASSOCIATION, Inc,



Roger A. Smith  
Technical Director

Mr. Edward Mazzullo, Director

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Enclosures

*C-13--1992 – Guidelines for Periodic Inspection and Requalification of Acetylene  
Cylinders*

*C-13--2000 – Guidelines for Periodic Inspection and Requalification of Acetylene  
Cylinders*

*SA-9—1999 – Scrap B and MC Acetylene Cylinders Re-Entering the Market Place*

Federal Register/Vol. 63, No 210/Friday October 30, 1998, pages 58460, 58512 –  
58514.

cc: Mr. C. Hochman – DOT

Ms. H. Mitchell – DOT

Mr. J. O'Steen – DOT

Mr. C. Johnson, President CGA (letter only)